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From: Environmental Caucus

Subject: Comments on the Revised Chapter 1, Bulletin 160

December 19, 2003

You will recall that at the December 12 meeting I verbally expressed our caucus' concerns with the December 12 rewrite of Chapter 1 of the Draft Bulletin. The following is a written record of our comments and recommendations to you.

We believe that the whole tone of Chapter 1 (and by implication, the upcoming Executive Summary) has been changed from the well-balanced and environmentally friendly approach in the September 30 version to a document that is no longer a well-balanced story. While we understand the pressure you have received from the Agricultural Caucus to modify Chapter 1, we feel that you have over-corrected and as a result have produced a draft document that is terribly out of balance. In our view, the rewrite of Chapter 1 has undermined three years of careful Advisory Committee work. There is no way that you can gain a semblance of consensus from the Public Advisory Committee with the current tone of Chapter 1. At the same time, the changes we are recommending are straight forward, easy to make and will redress the balance that is needed for the Plan.

Our specific objections to Chapter 1 are:

1. The Investment Guide, which was at the heart of Chapter 1 and was one of the main messages of the whole Plan no longer has a prominent place in Chapter 1. According to the December 12 draft, the 19 pages of narrative mention the Guide but do not show it or illustrate its prominence. Although the Guide is shown on the web site following Chapter 1, it is not clear that it is a part of Chapter 1.
2. The "Major Recommendations" shown on Page 6 are far less meaningful than the previous version since the Investment Guide which is mentioned in the first recommendation has not yet been shown. We concur that the Investment Guide should be the first and most important of the Major Recommendations, but the Investment Guide should precede the Recommendations in order to provide the proper context and tone of the Plan.
3. The Investment Guide shown on the web is a multi-page, complex document that effectively hides the demand reduction or conservation potential numbers – the very numbers that should be the most prominent and obvious part of the Guide.

4. The last paragraph on Page 2 has a discussion of future water demands to 2030 in the range of millions of acre feet but without any accompanying information that shows the millions of acre feet of potential demand reduction or conservation available during the same period. The previous version of Chapter 1 did show both sides of the equation so that readers could understand the potential savings available. Presenting only the “demand” side is terribly reminiscent of the “gap analysis” thinking of Bulletin 160-98 which received so much public criticism when published. We do not wish to go back to a Bulletin 160-98 “shortages only” mentality; it is a very misleading story about California’s potential future, especially when placed so prominently in Chapter 1 without balancing information.
5. A table called the “Selected Water Portfolio...” has been substituted for the Investment Guide. This table, while valuable for some background information, is presented with no discussion and leads to no actions or recommendations. Since it merely describes current water distribution in the state, it belongs in the chapter that describes “California Water Today.” The “Depletions” column is of little value except to agricultural water users who try to use it to show that they use less water than is commonly understood. The “Environmental Water Dedication” is not an Applied Water Usage and most of it is not dedicated at all. If we are going to discuss Applied Water Usage, the Environmental amount should not be shown. At a minimum it needs to be relabeled to “Natural and Dedicated River and Estuary Flows” or something similar in order to give the correct impression to readers; Depletions in this row makes no sense. Additionally, many of the Wild and Scenic flows are eventually used by agricultural and urban water users – a fact that is rarely mentioned in discussions of Wild and Scenic Flows.
6. On another subject not related to Chapter 1, we do not concur that “Environmental Water Use Efficiency” can be treated or measured in the same way that water use efficiency is measured for agricultural or urban usages. Water that is dedicated for environmental purposes as part of restoration plans is currently examined for its effectiveness in recovering species and habitat; along with a measurable adaptive management plan, this seems an adequate measure. In this regard, we think a sidebar that discusses the subject of “Environmental Water Use ‘Effectiveness’” and the paragraph that has been added to the Ecosystem Restoration narrative is adequate, since the subject has not been vetted by the Advisory Committee.

On the positive side, our recommendations are as follows:

1. Place a summarized version of the Investment Guide prominently at the beginning of Chapter 1. It is this subject that makes Bulletin 160-03 unique and shows the kind of balance that is needed in the Water Plan. A summarized version of the guide that shows the Resource Management Strategy and the Potential Benefits and Costs would allow readers to capture the essence and uniqueness of the

Guide. The one-page investment guide alerts readers in an easy to understand way that the Plan is designed to help people plan for meeting future water needs of California. It illustrates that future water needs will be met in a wide variety of ways and that the state and stakeholders have choices they can make. It is a positive statement about meeting the needs of the future, which is important to all stakeholders and to the new administration's emphasis on job-creation. As a "teaser," it will pull readers further into the document to learn about the complex details that are summarized in the guide. It could logically follow that the more complex version of the Guide, with the same numbers, would be shown later as part of the Implementation and Investment Guide, as currently planned. This change would also provide a frame of reference for the Major Recommendations section on Page 6.

2. Add information to the last paragraph of Page 2 that shows the magnitude of demand reduction/conservation numbers along with the potential water needs for the projected population grown to 2030. This would represent the more balanced approach than we believe is required of the Plan.
3. By reference, we concur with all the points made in Peter Gleick's December 16 memo to DWR on Chapter 1 revisions.
4. Move the "Water Portfolio" table to Chapter 2, "California Water Today" where it would seem to logically belong since it describes water usage today. Eliminate or rename the row called "Environmental Water Dedication" and get rid of the "Depletions" column.
5. These first four recommendations, above, would also apply to the upcoming Executive Summary.

In addition to the above recommendations related to Chapter 1 and the Executive Summary, following are two recommendations related to other sections of the Plan:

1. Keep the environmental water usage paragraph that has been added to the Ecosystem Restoration narrative and add a sidebar to the same narrative that briefly discusses environmental water use effectiveness.
2. As alternative to a previously discussed recommendation about the Water Management Strategies, create a separate chapter for the twenty-five strategies (instead of an Appendix). This will highlight them better than an Appendix and will allow them to stand alone as a separate removable section.

We hope these recommended changes are helpful and coincide with your interests. We feel that they are necessary in order to achieve a balance and a reasonable consensus within the Advisory Committee.

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For the Caucus